



Association for Local Telecommunications Services

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RICHARD J. METZGER
VICE PRESIDENT &
GENERAL COUNSEL

February 9, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M St., N.W.
Washington, D.C. 20054

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

- Re: (1) Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137;
- (2) Application by SBC Communications Inc., Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Oklahoma, CC Docket No. 97-121;
- (3) Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in South Carolina, CC Docket No. 97-208;
- (4) Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 97-231;
- (5) Request for Expedited Letter Clarification--Inclusion of Local Calls to ISPs Within Reciprocal Compensation Agreements, CC No. 96-98;
- (6) Petition for Expedited Rulemaking - Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; CC Docket No. 96-98, RM-9101;
- (7) In the Matter of Expanded Interconnection with Local Telephone Company Facilities; CC Docket No. 91-141

Dear Ms. Salas:

On Thursday afternoon and this morning, members of ALTS and CompTel met with Commission staff from the Common Carrier Bureau and its Policy Division to

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discuss various matters involving Section 271 checklist compliance by Southwestern Bell (see the attached attendance lists and items distributed at these meetings). Discussion on Thursday included:

- Number portability, number administration, and DA data bases were addressed by Mark Fuller and Dave Porter, among others. The competitive industry emphasized that incumbents such as SBC enjoy an embedded base of numbers that have never been groomed or reclaimed in any manner (unlike 800 numbers). The presence of this cushion of numbers shelters incumbents during NPA jeopardy situations even if nominally non-discriminatory procedures are used to allocate new numbering resources.
- Concerning White Page listings and DA data bases, the point was made by Tom Allen, Kath Thomas, Bruce Holdridge, and Ed Cadieux that SBC legacy systems provide inputs to these data bases in a mechanized fashion that does not exist in the OSS systems offered to new entrants.
- Terry Natoli of Teligent discussed SBC's involvement in the E911 provisioning process in Dallas, Texas, and the difficulties this presents.
- Dave Porter explained that despite the fact Texas arbitrations have required SBC to provide certain kinds of data loops, SBC will only provide ISDN loops under its interconnection agreement with WorldCom.

Topics on Friday included:

- Problems with SBC OSS were discussed by Ed Cadieux, Tom Allen, Julia Strow, Nancy Murrah, Charles Kallenbach, Don Shepard, Kelsi Reeves, Kath Thomas, Dave Porter, and Bruce Holdridge. Defects in the existing SBC gateway for resale were identified, as well as the defects in or absence of gateways for UNEs. The competitive industry proposed that this problem could be fixed if SBC were to provide mediated access to its legacy systems rather than attempting to band-aid makeshift systems that are inherently incapable of meeting the Section 271 standard.
- Interconnection issues were addressed by all the competitive industry participants. Bruce Holdridge pointed out that engineering standards to prevent or minimize blocking during busy hours are well understood throughout the

Ms. Magalie Roman Salas

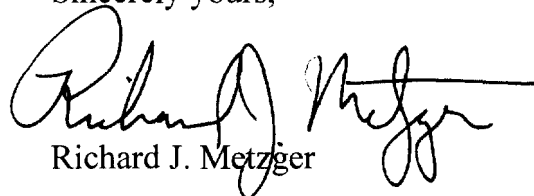
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telephone industry, and rigorously applied within SBC and other RBOCs. Application of these same standards and processes to interconnection trunks would insure they do not incur any more blocking than SBC's own trunks. Asked about whether CLECs might have caused the problem by failing to have their own facilities available, it was pointed out that CLECs have no motivation to degrade the quality of service received by their customers. As to the concern that CLECs might impose burdens on SBC by over forecasting traffic volumes, it was explained that penalties exist for IXC forecasts which erroneously create needless ILEC expense, and that analogous processes could be created for SBC-CLEC interconnection.

- Collocation issues were addressed by Tom Koutsky and Charles Kallenbach. Mr. Koutsky explained how Pacific required extensive cage construction, and then refused to build any cages in offices where less than a certain number of cages have been ordered. Mr. Kallenbach discussed the high cost of collocation in California. I pointed out that although the Commission originally declined to apply its various rulings concerning tariffed collocation to negotiated arrangements, it retains full authority to end these practices by promptly prescribing just and reasonable rates, terms and conditions for both physical and virtual collocation.
- Several participants addressed SBC's failure to pay reciprocal compensation on local calls to ISPs exchanged with CLECs even though it does pay for such calls under reciprocal compensation arrangements with adjacent LECs, and treats these calls as local in its ARMIS reports, separations reports, and state rate cases.
- Julia Strow concluded with a short discussion of resale concerns.

Sincerely yours,



Richard J. Metzger

cc: FCC attendees (w/o attachments)

2/6/98 Meeting

ED CADIEUX	BROOKS/WORLDCOM	(314) 579-4637
Tom Allen	ICG	770-350-7307
BRUCE HODRIDGE	ICG	510-251-7033
Kath Thomas	BROOKS/World Com	650-286-4288
DAVID N. PORTER	World Com	202-776-1550
Carol Matley	Policy	418-1580
Jeannie Sun	Policy	418-0491
Patrick DeGrazia	OPP	418-1378
Joe Welch	Policy	418-1598
Jake E. Jennings	Policy	418-1759
Kelsi Reeves	TIME WARNER	512. 485. 6240
Don Shepherd	Time Warner	203-328-4004
Rocky UNRUH	LCI	415-896-0666
Nancy L. Munn	ACSI	301-617-4368
Charles Kallenbach	ACSI	301-617-4208
Genny Morelli	Comptel	202/296-6650
Heather Gold	ALTS	202/ 969. ALTS
Wendy Lader	Policy	418-1381
Michelle Carey	Policy / CCB	418-1557
Joselyn GOLOSTEIN	Policy / CCB	418-2694
RUSSEL MERRITH	WINSTAR	202/530-7059
Julia Strow	Intermedia Communications	813-829-2072
Tom Koutsky	Covad Communications	703-765-4127
Eric Bash	Policy	
William Bailey		
Ann Soarn	Pricing	
Richard J. Metzger	ALTS	(202) 969-2583

2/5/98 Meeting

The same competitive industry members shown on the 2/6/98 list attended the 2/5/98 meeting, with the exceptions of Mark C. Fuller of ACSI, and Terri Natoli of Intelligent, who attended only the 2/5/98 meeting, and Kelsi Reeves and Don Shephard of Time Warner, Rocky Unruh of LCI, Nancy Murrah of ACSI, Russell Merbeth of WinStar, and Julia Strow of ICI, who attended only the 2/6/98 meeting.

The same Common Carrier Bureau and Policy Division staff members shown on the 2/6/98 list attended the 2/5/98 meeting, with the exception of Audrey Wright, Policy Division, Susan Launer, Policy Division, Erin Duffy, NSD, Marian Gordon, NSD, and David Kirschner, Policy Division, who attended only the 2/5/98 meeting, and Patrick DeGraba, Policy Division, Joe Welch, Policy Division, Jake Jennings, Policy Division, Wendy Lader, Policy Division, Michelle Carey, Policy Division, Jordan Goldstein, Policy Division, Eric Bash, Policy Division, and Amu Seam, Competitive Pricing, who attended only the 2/6/98 meeting.

January 30, 1998

Ms Kathryn Thomas
Brooks Fiber Communications
1660 Amphlett Blvd. #330
San Mateo, CA 94402

Dear Kathryn,

This is a notification on Pacific Bell's current central office collocation status.

■ **CENTRAL OFFICE LOCATION WITH SPACE AVAILABLE:**

CO CODE	ADDRESS	ESTIMATED DATE AVAILABLE
ANHMCA01	217 N Lemon Street, Anaheim, CA 92805	March 1998

■ **CENTRAL OFFICE LOCATION CURRENTLY WITH NO SPACE AVAILABLE:**

CO CODE	CITY
ALBYCA11	Albany
ALMDCA11	Alameda
ANHMCA11	Anaheim
ARTNCA11	Arlington
BSRNCA70	San Ramon
CNCRCA01	Concord
COLACA01	Colma
CRLSCA11	Carlsbad
DAVLCA12	Danville
DLMRCA12	Del Mar
ELSGCA12	El Segundo
ELTRCA11	El Toro
FNTACA11	Fontana
FRMTCA11	Fremont
FRMTCA12	Fremont
GLDLCA11	Glendale
HGLDCA11	Highland
HRCLCA11	Hercules
HYWRCA01	Hayward
HYWRCA11	Hayward

CO CODE	CITY
IRVNCA11	Irvine
MADRCA12	Madera
MLPSCA11	Milpitas
MNPKCA11	Menlo Park
MTVWCA11	Mountain View
NORGCA11	Northridge
NSCRCA12	North Sacramento
OKLDCA03	Oakland
ORNGCA14	Orange
OTMSCA11	Otay Mesa
PLALCA02	Palo Alto
PLALCA12	Palo Alto
PLDLCA01	Palmdale
PLTNCA13	Pleasanton
POWYCA11	Poway
RBRNCA11	Rancho Bernardo
RNPSCA11	Rancho Penasquitos
RNSDCA11	Rancho San Diego
RSFECA12	Rancho Santa Fe
RVSDCA11	Riverside

CO CODE	CITY
SNANCA11	Santa Ana
SNCRCA11	San Carlos
SDNGCA15	San Diego
SNFCCA14	San Francisco
SNFCCA19	San Francisco
SNJSCA12	San Jose
SNJSCA21	San Jose
SNMCCA11	San Marcos
SNMTCA11	San Mateo
SNRFCA01	San Rafael
SNRMCA11	San Ramon
SNTCCA01	Santa Clara
SNTCCA02	Santa Clara
SNVACA01	Sunnyvale
UNCYCA11	Union City
WLANCA01	West Los Angeles
WNCKCA11	Walnut Creek
YRLNCA12	Yorba Linda
TUSTCA11	Orange

Note: Status of Relief for the above central offices will be available next issue.

Please contact your Account Manager for further details.

Sincerely,


Collocation Services

cc. R. Stanley, E. Herrera, L. Mendoza

Pre-Ordering ► ► ►

Options for Access to Pacific Bell OSS Functions

DataGate

(Resale and UNE)

DataGate allows CLECs to use their own user interface to interactively access Pacific Bell systems in real-time. CLECs must develop to DataGate before they can access Pacific Bell systems. In the event that new protocols for pre-ordering local exchange services are produced by industry forums, such protocols would be used by SWB to "front-end" DataGate.

Toolbar Verigate

(Resale and UNE)

Verigate is a Toolbar application to confirm information on an ASR or LSR before submittal. By providing real-time access to Pacific Bell Operational Support Systems, Verigate allows CLECs to verify information on the Customer Service Record (CSR). This verification can reduce service order supplements and shorten the time it takes to process an order. In addition, pre-ordering validation is available for Telephone Number Assignment (TNA), Caller ID Code (CIC), Product and Feature Availability (PFA) and Address Validation.

StarWriter

(Residence Resale)

StarWriter is a menu-driven, English-based order entry system for single-line residential resale services. The pre-ordering functions of CSR, Telephone Number Assignment (TNA), Due Date Assignment, Carrier Identification Code (CIC), Product and Feature Availability (PFA), and Address Validation are integrated with the ordering process.

SORD

(Resale)

An on-line application which accepts, edits, stores, and distributes service orders for resale complex services. SORD utilizes Pacific Bell USOCs and FIDs, without English identifiers. SORD provides access to the CSR, in USOC form, and Due Date as pre-ordering functions when SORD is used for ordering.

CESAR

(Resale and UNE)

CESAR provides access to pre-ordering functions for Resale and UNE. This application will be phased out for CLEC access following establishment of these functions in Verigate. This includes access to Product Feature Availability (PFA), Carrier ID Code (CIC), Address Validation, Telephone Number Assignment (TNA) and Flexible Due Date (FDD), but does not include access to the CSR. (Access to CSR information may be obtained via Verigate as previously described.)

Proprietary: Not for use or disclosure outside Pacific Bell except by prior written agreement. Contract Local Service Provider may use, reproduce, copy and distribute the information solely for internal use in interconnection with SBC. Additional or external use is not authorized.

Ordering/Provisioning ►►►

Options for Access to Pacific Bell OSS Functions

StarWriter (California only)

(Resale Resale)

See previous information under **Pre-Ordering**. StarWriter provides integrated pre-ordering and ordering capability.

SORD

(Resale)

See previous information under **pre-ordering**. SORD provides integrated pre-ordering and ordering capability.

EDI Gateway

(Resale and UNE)

National standard ordering format. Allows CLECs to send OBF Local Service Requests (LSRs) for Resale and Unbundled Network Elements. CLECs must develop their own systems to create EDI orders and transmit them to Pacific Bell. Pacific Bell systems will perform editing and return acknowledgments, FOCs, and Service Order completions.

Toolbar LEX

(Resale and UNE)

Pacific Bell graphical user interface (GUI) that allows CLECs to create and submit national standard format (LSR) for ordering Resale services and UNEs. Like Verigate, LEX is part of the Toolbar.

RMI

(Resale)

RMI is a Resale ordering gateway utilizing Pacific Bell proprietary formats via NDM data exchange. Functionality includes Residential and Business Basic Exchange Services as well as PBX trunks and DID. This interface will be phased out and replaced with functionality via the EDI ordering interface.

PBSM

(Resale)

PBSM is an ordering interface that provides CLECs capability to submit Resale Centrex and ISDN service requests.

PBOD

(Resale)

Using DataGate to access PBOD (see previous information under **Pre-Ordering**), CLECs can obtain provisioning status on their basic exchange field work orders. This tracking tool provides technician scheduling and routing information. CLECs may also view due date status.

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Repair & Maintenance ►►►

Options for Access to Pacific Bell OSS Functions

PBSM

PBSM is an on-line interface that allows CLECs to perform Mechanized Loop Test (MLT), issue trouble tickets, view status, and view trouble history.

Electronic Bonding Interface

The Electronic Bonding Interface allows CLECs to submit trouble reports, dynamically receive trouble status updates, receive trouble closure and perform MLTs for POTS.

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Usage Extract Feed

(Resale and UNE)

Daily file of the usage billed to the resold account or the UNE port. Data is provided in the industry standardized Exchange Message Record (EMR) format. Enables CLECs to track end user usage on a daily basis, manipulate usage data to generate any report, re-bill end users, audit specific usage, and track long-distance calls/volume.

Electronic Data Interchange Billing (EDIB)

(Resale)

Utilizes national standard for EDI – ANSI ASC X12 811 Transaction Set, providing the same information as on the paper bill. With EDIB and some translation software that can be purchased, a CLEC can eliminate re-keying information from a paper copy to their internal system, manipulate billing data to generate reports, export data to other internal systems, and obtain billing data for their end-user customer billing system.

Bill Data Tape

(UNE)

CLECs may receive data in an electronic format from Pacific Bell's CABS database via the local Bill Data Tape in the Billing Output Specifications (BOS) format.



**Presentation of
ICG Communications Inc.
To The
Federal Communications Commission**

February 5 & 6, 1998

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Executive Summary

At this time, Pacific Bell should be denied any authority for in-region long distance service. If Pacific Bell is granted in-region long distance authority, Pacific Bell will have no incentive to create or improve the systems, processes, and services that are necessary for the establishment and growth of resale and facilities-based local exchange competition in California. Indeed, without the Telecommunications Act of 1996, the resale of Pacific Bell services and related support systems and processes wouldn't be available at all, and local exchange competition, as little as there is, would not exist.

If Pacific Bell files a 271 Application, it should be denied because Pacific Bell has, at a minimum, failed to comply with various Competitive Checklist Items of the Telecommunications Act of 1996, and because Pacific Bell still has numerous problems and issues that must be corrected and addressed before self-sustaining competition will develop and continue to exist. It is premature to grant Pacific Bell in-region long distance authority for the following reasons:

- Pacific Bell does not provide access parity to Operational Support Systems (OSS).
- Pacific Bell is proposing "new" OSS support which have yet to be tested and proven acceptable by all Competitive Local Carriers (CLCs).
- Pacific Bell's "new" OSS system and access costs and prices have yet to be disclosed to CLCs.
- Pacific Bell is perhaps beginning to "slam" CLC customers.
- Pacific Bell repeatedly loses local service when migrating service from Pacific Bell to CLCs.
- Pacific Bell improper support of resale services actually damages the CLC public image and reputation.
- Pacific Bell frequently changes resale service policies.
- Pacific Bell has a discriminatory Centrex to Business Line number change policy.
- Pacific Bell has a very high degree of missing, incorrect, and/or delayed Directory Assistance listings.
- Pacific Bell has lengthy or delayed service order provisioning intervals.
- Pacific Bell provides inconsistent and misleading public information.

Executive Summary (cont.)

Pacific Bell often claims its resale support structures and systems gives CLCs performance standards and service intervals equivalent to Pacific Bell's own when in fact they do not. Pacific Bell often states in public policy presentations the company standards, intervals, systems, and practice but when a check is made to see whether Pacific Bell is in fact achieving results as promised, one will discover, as the ensuing documentation will show, that the results are vastly different and of lower quality. Pacific Bell promises one thing, delivers another, and then publicly promotes what was promised, not what Pacific Bell achieved.

If the competitive local exchange industry is to grow, survive, and competitively self-sustain itself, Pacific Bell must be denied the authorization to provide in-region long distance services. Overall, the market penetration of local exchange services has been, and still is, minimal, at best. The local exchange market is a long way from being irreversibly open to competition.

Pacific Bell Operational Support Systems Issues

- Pacific Bell claims it is not required to provide Operational Support System (OSS) access, response time and general system parity between itself and Competitive Local Carriers (CLCs). Further more, Pacific Bell is proposing "new" OSS support structures which it claims will better service CLCs, yet, Pacific Bell has not tested the new systems with all CLCs, nor trained system users, and certainly the new systems have not been tested in a real-time environment using the daily loads and demands put upon such systems by CLCs. More over, Pacific Bell has yet to identify the costs associated with the "new" OSS systems nor has Pacific Bell divulged the price CLCs will be charged for access and use of the "new" sytems. Additionally, one could deduce from the attached documentation that Pacific Bell is building "new" OSS systems that will better support the needs of local exchange resellers over facilities-based providers.

Documentation: Tab 2 - California Public Utilities Commission Order Instituting Investigation on the Commission's Own Motion into Monitoring Performance of Operations Support Systems - R.97-10-016/I.97-10-017 - Pacific Bell's Comments on the Proposed Interim Rules for OSS Performance Measures.

Documentation: Tab 3 - California Public Utilities Commission Order Instituting Investigation on the Commission's Own Motion into Monitoring Performance of Operations Support Systems - R.97-10-016/I.97-10-017 - Pacific Bell's Reply Comments on the Proposed Interim Rules for OSS Performance Measures.

Resale Service Issues

- ICG has experienced an incident where Pacific Bell changed an ICG business local exchange resale customer from ICG back to Pacific Bell without the customer ever requesting to go back to Pacific Bell. Additionally, Pacific Bell never had a Letter of Agency authorizing such changes. In fact, Pacific Bell attempted to keep the customer on Pacific Bell local exchange service by crediting the customer's Pacific Bell account all non-recurring charges associated with the change back to Pacific Bell business line service. In order to return the customer to ICG, and after obtaining a letter from the customer (attached), ICG was forced to escalate the incident to senior executive Pacific Bell management as well as re-execute Automated Service Requests. Further more, Pacific Bell improperly reassessed to ICG non-recurring change over charges associated with returning the customer to its carrier of choice, ICG, in which case ICG had to fight Pacific Bell to have the second set of non-recurring charges removed.

Documentation: Tab 4 - Customer letter from Sheet Metal Workers International Association.

- Pacific Bell frequently loses all local exchange service when migrating customers from Pacific Bell to ICG. Generally, service outage times average from four hours to 24+ hours.

Documentation: Tab 5 - Customer letter from AAA Flag & Banner Manufacturing Company Incorporated.

- Pacific Bell's poor OSS and LISC service cause CLC end-user customers to form a poor image of CLCs when reselling Pacific Bell loops. In fact, Sprint has filed an Advice Letter with the CPUC requesting to "grandfather" Pacific Bell resold local residential services.

Documentation: Tab 6 - Copy of Sprint Telecom. Ventures Advice Letter No. 44 and Statements of William Harrelson, counsel for MCI, and William Ettinger, counsel for AT&T, in IECs' complaint case against SBC/Pacific Bell explaining why IECs are no longer promoting resold services. AT&T Notice of Ex Parte Communication with CPUC, CPUC Case Numbers 96-12-026, 96-12-044, 97-02-021.

Resale Service Issues (cont.)

- Pacific Bell has frequent resale service policy and points of contact changes which are confusing and misleading, cause service provisioning and installation delays, and are sometimes unfair and unnecessary.

Documentation: Tab 7 - Copy of electronic mail from Justin Chris-Tensen, ICG, Director, Resale Local Service Center, Sacramento, California.

Documentation: Tab 8 - Copy of electronic mail from Maryanne Chagnon, ICG, Manager, Resale Local Service Center, Sacramento, California.

Number Portability Issues

- Pacific Bell, with extreme frequency, incorrectly implements Directed Number Call Forward (DNCF) when converting resale business line customers from Pacific Bell service to ICG service. Pacific Bell consistently disconnects the customers old telephone number long before implementing the new ICG telephone number thus leaving the customer without telephone service; or, Pacific Bell implements the wrong new phone number on number change announcements.

Documentation: Tab 9 - Copy of electronic mail from Darlene Dudics, ICG, Customer Service Manager, Irvine, California.

Customers: Chen International
Travers Realty
International Marine
Legal Reprographics

Documentation: Tab 10 - Copy of electronic mail from Jim Haynes and Ann Cowan, ICG, Southern California.

Customers: Burnham Institute
Audio, Video & Computers
Legal Reprographics

- Pacific Bell has a policy and is unwilling to provide number retention when changing customers from Centrex service to business line local exchange service. There is no technical reason for this policy.

Documentation: Tab 11 - Customer letter from State of California, Franchise Tax Board.

Directory Assistance Issues

- Pacific Bell, with a great degree of consistency, provides incorrect, late, and/or missing directory assistance listings on business line resale services.

Documentation: Tab 12 - Copy of electronic mail from Jim Haynes, ICG, Southern California.

Customers: AAA Flag and Banner Mfg. Co., Inc.
It's a Small World Travel Company
Globe Trotter Travel Company

Service Provisioning Issues

- Pacific Bell is unable to fulfill trunk capacity requests forecasted by ICG to Pacific Bell in 3Q and 4Q 1997 (ICG has also provided a 5 year trunk forecast). As a result, ICG end-user customers cannot complete calls due to All Trunks Busy announcements ("All circuits are busy - please try your call again later"). This creates a poor ICG/CLC image to the end-user and general public, as well as stalls reciprocal compensation. ICG trunk requests placed in 3Q1997 will not be fulfilled by Pacific Bell until 12/98. Pacific Bell tandem switches currently exhausted in capacity are:

ANHMCA0295T (Anaheim, CA)
LSANCA0470T (L.A., CA)
OKLDCA0349T (Oakland, CA)
SNFCCA2143T (San Fran, CA)

Pacific Bell does not have procedures and processes for integrating CLC forecasted needs into the Pacific Bell network growth plans, thus harming the CLCs image.

Documentation: Tab 13 - Letter from ICG Switch Planner, Eric Hagerson to ICG Switch Planning Manager, Kelly Dowell. Copies ASR trunk requests and copy of corresponding Pacific Bell ISR confirmation stating "Held & Denied" due to no facilities, some with no relief dates at all, others with relief dates as late as 12/98 when initial order was placed 3Q97.

Service Provisioning Issues (cont.)

- Pacific Bell has inconsistent service order provisioning intervals. For example, on resale service orders, Firm Order Confirmations or often worked faster than Expedite Request Confirmations. Additionally, Pacific Bell can miss due dates by "either a couple of days or up to almost a full month". This includes services to end-user customers as well as interconnecting network trunks (inter-machine trunks) needed to process calls between the Pacific Bell and ICG networks. This is especially the case when ICG service requests must be coordinated between Pacific Bell and GTE California, Inc.

Documentation: Tab 14 - Letter from Jamie Timmerwilke, ICG, Manager, LEC Escalation's, California Market, and copies of SBC/Pacific Bell's CESAR System Automated Service Request and Circuit Layout Records. Letter from Jamie Timmerwilke regarding San Diego Community College.

Misleading Public Information

- Pacific Bell justifies there is local exchange competition and the markets are fully open when in fact Pacific has over 17 million lines, have lost 251, 790 lines to competition (a mere 1.5% of the total market), yet SBC Communications "fourth-quarter earnings rose 22% as the company added phone lines and wireless customers, and said it had begun to cut costs since its acquisition of San Francisco-based Pacific Telesis Group." Annual line growth at Pacific Bell is estimated at 500,000 lines per year. Thus, the loss to competition isn't even keeping pace with line growth. Obviously, this is not self-sustaining competition.

Documentation: Tab 15 - Newspaper article, "Pacific Bell Wants Into Long Distance In State by August", from the San Francisco Chronicle, Business section, Friday, January 30, 1998.

Documentation: Tab 16 - Newspaper article, "SBC Communications Earnings Climb 22%", from the San Francisco Examiner, Thursday, January 29, 1998.

GTE California

- **Proof that things will get worse once an Incumbent Local Exchange Company (ILEC) receives in-region authorization to provide long distance services.**

Documentation: Tab 17 - Copies of various electronic mail memorandums documenting the extensive and horrific problems encountered with GTE California resale service provisioning procedures, systems, process, and representatives.

Pacific Bell Operational Support Systems Issues

- Pacific Bell claims it is not required to provide Operational Support System (OSS) access, response time and general system parity between itself and Competitive Local Carriers (CLCs). Further more, Pacific Bell is proposing "new" OSS support structures which it claims will better service CLCs, yet, Pacific Bell has not tested the new systems with all CLCs, nor trained system users, and certainly the new systems have not been tested in a real-time environment using the daily loads and demands put upon such systems by CLCs. More over, Pacific Bell has yet to identify the costs associated with the "new" OSS systems nor has Pacific Bell divulged the price CLCs will be charged for access and use of the "new" sytems. Additionally, one could deduce from the attached documentation that Pacific Bell is building "new" OSS systems that will better support the needs of local exchange resellers over facilities-based providers.

Documentation: Tab 2 - California Public Utilities Commission Order Instituting Investigation on the Commission's Own Motion into Monitoring Performance of Operations Support Systems - R.97-10-016/l.97-10-017 - Pacific Bell's Comments on the Proposed Interim Rules for OSS Performance Measures.

Documentation: Tab 3 - California Public Utilities Commission Order Instituting Investigation on the Commission's Own Motion into Monitoring Performance of Operations Support Systems - R.97-10-016/l.97-10-017 - Pacific Bell's Reply Comments on the Proposed Interim Rules for OSS Performance Measures.

Summary References

- See pages 5-7: Pacific Bell Opposition to OSS Standards.
- See page 8: Pacific Bell Opposition to Direct Access to Legacy Systems.
- Pacific Bell advocates CLCs to use “mediated” access to OSS.